

RECEIVED

SEP 17 1993

DOCKET FILE COPY ORIGINAL

FCC MAIL ROOM

BEFORE THE

**Federal Communications Commission**

WASHINGTON, D.C. 20554

In the Matter of )  
 )  
Amendment of Section 73.202(b) )  
FM Table of Allotments )  
FM Broadcast Stations )  
Keno and Bonanza, Oregon )

MM Docket # 93-208  
RM - 8281

To: The Chief, Mass Media Bureau

PETITION FOR COUNTERPROPOSED RULEMAKING

Comes now, Goldrush Broadcasting, in pro per, to respectfully request that the Commission dismiss the proposed rulemaking at Keno, Oregon and accept this counterproposed rulemaking request. The petitioner requests that the Commissions' Rules be amended to allot the following FM channel to the community of Bonanza, Oregon and that Section 73.202(b) be amended as follows:

<u>CITY</u>	<u>EXISTING CHANNEL</u>	<u>PROPOSED CHANNEL</u>
Bonanza, Oregon	NONE	253 A
Keno, Oregon	NONE	NONE

In support of this petition the following is submitted:

1. Through this counterproposed rulemaking request, Goldrush Broadcasting pleads that the Commission allot FM channel 253 A to the incorporated city of Bonanza, Oregon as the first local FM channel assigned to the community and that the Commission reject and dismiss the proposed rulemaking at Keno, Oregon because Keno is not a community for allocation purposes. Keno is not a community.

2. Through this petition request Goldrush Broadcasting states that if the Commission allots FM channel 253 A or another FM channel of like class, Goldrush Broadcasting will file a request to build and operate an FM broadcast station at Bonanza, Oregon.

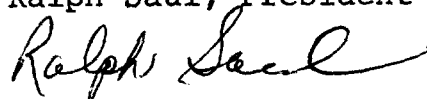
3. All attached data to prove that Bonanza is deserving of an FM broadcast station also provides proof that FM channel 253 A can be allotted, if the proposed allotment of FM channel 253 a to Keno, Oregon is not granted and is dismissed.

In conclusion, Goldrush Broadcasting requests that the commission allot FM channel 253 A or another channel of equal class to the city of Bonanza, Oregon so that Goldrush Broadcasting may apply to the Commission to build and operated a station at Bonanza. When allotted, Goldrush will apply for use of the channel at Bonanza. Goldrush Broadcasting also requests that the Commission dismiss the proposed allocation of 253 A to Keno, Oregon for lack of a bonafided community status.

Dated: Sept. 16, 1993.

Respectfully,

Ralph Saul, President



Goldrush Broadcasting  
a Division of Goldrush Communications  
7544 Second Street  
Downey, California 90241  
(310) 806-1461

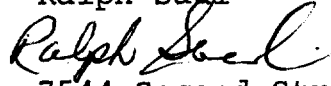
CERTIFICATION

I, Ralph Saul do hereby confirm that I have this day sent a true copy of the enclosed counterproposed rulemaking request to the the following and that I have sent the copies by first class U.S. Mail, postage prepaid:

1. Federal Communications Commission  
Leslie K. Shapiro  
1919 'M' Street NW.  
Washington, DC. 20054
2. Brett E. Miller  
11608 Blossomwood Court  
Moorpark, California 93021

I do hereby confirm under penalty of perjury that I have this day mailed the above persons a true copy of the petition and that all statements of fact are true and correct.

Dated this day, Sept. 16, 1993.

Ralph Saul  
  
7544 Second Street  
Downey, California 90241  
(310) 806-1461

## FM Spacing study

Title: Bonanza, OR. Counterproposal to Keno, OR.  
Channel 253 A ( 98.5 MHz)

Latitude: 42/12/00  
Longitude: 121/24/00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
PRM	ADD	Let's Talk Radio	250C2		41-48-25		233.70	55
Crescent North	CA		97.9		124-10-16		178.70	CLEAR
KPOD-FM LIC		Let's Talk Radio	250A	3	41-45-35		236.44	31
Crescent City	CA	BLH-890216KD	97.9	-38	124-11-28		205.44	CLEAR
ALLOC			250C3		41-45-35		236.44	42
Crescent North	CA	DOC-89-202	97.9		124-11-28		194.44	CLEAR
KPOD-FM CP		Let's Talk Radio	250C3	25	41-45-35		236.44	42
Crescent North	CA	BPH-900816IB	97.9	-43	124-11-28		194.44	CLEAR
PRM	DEL	Let's Talk Radio	250C3		41-45-35		236.44	42
Crescent North	CA	DOC-93-31	97.9		124-11-28		194.44	CLEAR
ALLOC			250C		44-00-05		243.96	95
Eugene	OR		97.9		123-06-50		148.96	CLEAR
KUGN-FM LIC		Combined Communications,	250C	100	44-00-08		244.04	95
Eugene	OR	BLH-910528KF	97.9	308	123-06-50		149.04	CLEAR
ALLOC			251C		40-39-18		195.57	95
Redding	CA		98.1		122-31-21		100.57	CLEAR
KVIP-FM LIC		Northern Ca. Comm. Corpo	251C	30	40-39-18		195.57	95
Redding	CA	BLH-840518DV	98.1	521	122-31-21		100.57	CLEAR
KLDR	CP	Grants Pass Broadcasting	252C2	1.85	42-22-56		155.94	106
Harbeck-Fruitdale	OR	BPH-920909ID	98.3	638	123-16-29		49.94	CLEAR
DOC-90-603								
KLDR	LIC	Grants Pass Broadcasting	252A	.13	42-22-56		155.94	72
Harbeck-Fruitdale	OR	BMLH-910729KD	98.3	639	123-16-29		83.94	CLEAR
DOC-90-603								
ALLOC			252C2		42-22-56		155.94	106
Harbeck-Fruitdale	OR	DOC-91-340	98.3		123-16-29		49.94	CLEAR
KTWS	APC	The Confederated Tribes/	252C3	6.80	44-04-41		208.71	89
Bend	OR	BPH-920917IG	98.3	191	121-19-57		119.71	CLEAR
KTWS	LIC	The Confederated Tribes/	252C3	7DA	44-04-41		208.71	89
Bend	OR	BLH-901211KB	98.3	188	121-19-57		119.71	CLEAR
DA: oddball		ODD900416ID @ 0 deg						
ALLOC			252C3		44-04-41		208.71	89
Bend	OR	DOC-89-208	98.3		121-19-57		119.71	CLEAR

## FM Spacing study

Title: Bonanza, OR. Counterproposal to Keno, OR.  
Channel 253 A ( 98.5 MHz)

Latitude: 42/12/00  
Longitude: 121/24/00

Call City of License	Auth Licensee name St FCC File no.	Chan Freq	ERP-kW EAH-m	Latitude Longitude	Br-to -from	Dist. (km)	Req. (km)
KYTT-FM LIC Coos Bay	Mustard Seed Broadcaster OR BLH-781103AJ	252A 98.3	.70 168	43-23-26 124-07-46	259.53 187.53	72 CLEAR	
KXBX-FM LIC Lakeport DOC-83-1092	Vis. Radio Euphonics of CA BLH-850219KW	252A 98.3	3 91	39-02-54 122-45-59	368.58 296.58	72 CLEAR	
ALLOC Lakeport	CA	252A 98.3		39-02-54 122-45-59	368.58 296.58	72 CLEAR	
PRM Keno	ADD Brett E. Miller OR	253A 98.5		42-07-30 121-55-42	44.45 -70.55	115 SHORT	
KSAY Fort Bragg	APC Wade Axell CA BMLH-920205KA	253A 98.5	3.30 136	39-28-03 123-45-34	362.88 247.88	115 CLEAR	
ALLOC Fort Bragg	CA	253B1 98.5		39-28-03 123-45-34	362.88 219.88	143 CLEAR	
ALLOC Portland	OR	253C 98.5		45-27-13 122-32-45	373.07 147.07	226 CLEAR	
KUPL-FM LIC Portland	Scripps-Howard Broadcast OR BLH-860324KF	253C 98.5	100 337BT	45-27-13 122-32-45	373.07 117.07	226 CLEAR	
KNCI Sacramento	APC Nationwide Communication CA BPH-930412ID	253B 98.5	50 151	38-38-53 121-05-51	395.25 217.25	178 CLEAR	
ALLOC Sacramento	CA	253B 98.5		38-38-35 121-05-51	395.80 217.80	178 CLEAR	
KNCI Sacramento	LIC Nationwide Communication CA BLH-800729AA	253B 98.5	50 152	38-38-35 121-05-51	395.80 217.80	178 CLEAR	
ALLOC Coos Bay	OR	254C2 98.7		43-23-26 124-07-46	259.53 153.53	106 CLEAR	
KCMT Chester	LIC Ralph E. Wittick CA BLH-890427KB	255C 98.9	25 737	40-14-00 121-01-11	220.73 125.73	95 CLEAR	
ALLOC Chester	CA	255C 98.9		40-14-00 121-01-11	220.73 112.73	95 CLEAR	
KPNW-FM LIC Eugene	Pacific Northwest Broadc OR BLH-840409BY	256C 99.1	100 497	44-06-56 122-59-56	249.40 154.40	95 CLEAR	
ALLOC Eugene	OR	256C 99.1		44-06-56 122-59-56	249.40 154.40	95 CLEAR	

>> End of channel 253C study <<